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Attorney for Defendant

United States District Court
Eastern District of Washington
Before the Hon. Salvador Mendoza, Jr.

United States of America,

Plaintiff,

v.

Hussein Yasir,

Defendant.

No. 4:21-CR-06042-SMJ-2

Defendant Yasir's Motion for
Discovery Conference Hearing

January 20, 2021 at 11:15 AM
Without oral argument

Defendant Yasir, through his attorney of record, moves the Court under Fed. R. Crim. P. 16(d)(1) to hold a discovery conference hearing.

On December 29, 2021 (the deadline for pretrial motions), the undersigned received a password protected hard drive from the Government containing 931 GB of discovery (GB, not MB). This discovery contains approximately 10,805 files, of which about 8,475

Discovery Conference Motion

1 are PDF files. The remaining 2,330 files are of various file types. A
2 quick review by counsel identified about 1,500 of these files are
3 image files (e.g. .jpg, .tiff), about 226 are audio/visual recordings of
4 some sort (e.g. .wav, .mp4), about 161 are database files (e.g. .xml),
5 about 38 are websites (e.g. .html) and 27 are spreadsheets (e.g.
6 .xlsx). That leaves about 372 files with file types not immediately
7 recognized by counsel.

8 Counsel anticipates additional discovery may be forthcoming from
9 the Government.

10 Mr. Yasir respectfully asks the Court to regulate the disclosure of
11 discovery under Fed. R. Crim. P. 16(d)(1) by holding a discovery
12 conference at the pretrial hearing. Mr. Yasir respectfully asks the
13 Court to order the Government to disclose at the discovery
14 conference hearing, to the best of their current knowledge, the
15 nature and extent of any anticipated additional discovery. The
16 purpose of this hearing is to ensure the efficient dissemination of
17 this knowledge to all defendants and their counsel and to facilitate
18 case budgeting.

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1 Dated: December 29, 2021

Respectfully Submitted,

2 s/Adam R. Pechtel

Adam R. Pechtel/ WSBA #43743

3 Attorney for Defendant

Pechtel Law PLLC

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1 SERVICE CERTIFICATE

2 I hereby certify that on December 29, 2021, I electronically filed the
3 foregoing with the Clerk of the Court using the CM/ECF System,
4 which in turn automatically generated a Notice of Electronic Filing
5 (NEF) to all parties in the case who are registered users of the
6 CM/ECF system. The NEF for the foregoing specifically identifies
7 recipients of electronic notice. I hereby certify that I have mailed by
8 United States Postal Service the document to the following non-
9 CM/ECF participants: N/A.

10
11
12 s/Adam R. Pechtel
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